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Subject: East Chicago Local Limit Study
Date: Tuesday, May 8, 2018 11:06:13 AM
Attachments: [image003.png](#)
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[LOCAL LIMIT STUDY ~ FINAL.pdf](#)
[LOCAL LIMIT SAFETY-KLEEN RESPONSE LTR050218.pdf](#)

Attached for your review and approval is the final Local Limit Study in support of amending several of the current local limits presently enforced by the East Chicago Sanitary District. This final version does not have any significant changes from the initial version study previously provided last year. The only comments received from permitted industrial users were received from Safety-Kleen. Our responses to their comments under separate letter are also attached. The changes made to the report primarily address the comments received from USEPA and consist of correction of several typographical errors and the provision of proper analytical data for 2016 CBOD values to address USEPA's comments which are as follows:

1. Were hydraulic detention times taken into account for the influent/effluent sampling?

No, the samples have historically been collected on the same date with no regard to hydraulic detention time through the plant based upon the NPDES sampling requirements. Grab samples for the influent wastewater is collected on twice a month and the effluent samples are collected on a weekly basis, typically on Mondays. Please note that the hydraulic retention time and appropriately paired influent and effluent samples, collected using the appropriate POTW hydraulic lag time, are needed if you calculate removal efficiency using the Average Daily Removal Efficiency method. The District calculated its removal efficiencies using the Mean Removal Efficiency Method in accordance with USEPA Local Limit Guidance which states that if less than 10 data pairs of influent and effluent data are available; the removal efficiency calculated by Mean Removal method is recommended. The Mean Removal Efficiency calculation is also less sensitive to variations in daily removal efficiencies.

2. On page 26 at #12 for fluoride in the second sentence, where does the 27mg/l come from? Is this just a typo?

Yes, this is a typo. The correct value should be 30 mg/l, consistent with Table 9.1.

3. On page 28 at #26 for Zinc in the last sentence should the word "phosphorus" actually be "zinc". I believe this is a typo.

Yes, this is another typo and should actually be zinc, as you correctly noted.

4. In Attachment B, the 2016 CBODs sampling results for influent and effluent are much higher than the results for 2013, 2014 and 2015. Please provide an explanation for these differences.

The CBOD values in Attachment B Summary of MRO Data (2016) incorrectly summarized the monthly loading values (pounds per day) rather than the concentration of CBOD in milligrams per liter (mg/L) as reported for the years 2013 – 2015. The 2016 CBOD concentrations are

consistent with previous historical data, as presented below.

	2016	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
CBOD5 (mg/L)	Influent	53	105	45	35	48	43	40	30	32	33	41	47
	Effluent	5.0	3.8	2.5	2.6	2.2	2.6	3.5	3.2	2.4	2.4	3.4	2.8

The final Local Limit Study will provide the correct data in the Table B.3.

5. Does East Chicago accept hauled waste and was this taken into consideration in the local limit development? And if so, is hauled waste subject to local limits?

Yes, East Chicago accepts hauled wastes on rare occasions. Typically this is from various operations that generate minimal quantities of wastewater and/or instances where discharge to a sanitary sewer is impractical. The District requires wastewater characterization analysis demonstrating that Local Limits are not exceeded, in addition to collecting TSS and COD data for determination of any surcharges that may apply, if accepted. If the hauled waste is accepted, the hauled waste is discharged into one of our sanitary lift stations at a time that our pump station attendant is present. No hauled wastes have been accepted in the last three years.

6. All of the equations listed in the local limit document such as on pages 12 and 13 (among others) are simply hash marks, please submit the actual equations used in this study.

We apologize if your copy of the Local Limit Study did not have the complete equations. It appears that the conversion from a word document to pdf did not properly convert the equations. The proper equations will be included in the final report provided to you for review.

7. The study states that acute and chronic water quality criteria was accounted for in calculating local limits, although the local limit tables 7 & 8 in Attachment E only local limits were calculated for Iron and no other POCs. Please explain why no other POCs were considered.

It appears that the wrong versions of Tables 7 & 8 were appended to the final local limit study. The correct Tables 7 & 8, which includes additional POCs that were considered, will be included in the final report for your review.

We look forward to you review and approval of the local limit study. Once approved, the District will incorporate the new local limits into its Sewer User Ordinance (SUO) once adopted by the Sanitary Board and East Chicago City Council. Should you have any questions or require additional information, please contact us at your convenience.

Yours truly,



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